

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

SCOTT TURNAGE, CORTEZ D. )  
BROWN, DEONTAE TATE, JEREMY S. )  
MELTON, ISSACCA POWELL, KEITH )  
BURGESS, TRAVIS BOYD, )  
TERRENCE DRAIN and KIMBERLY )  
ALLEN on behalf of themselves and )  
all similarly situated persons, )

Plaintiffs, )

v. )

Civil Action No.  
2:16-cv-02907-SHM-tmp  
Jury Demanded

BILL OLDHAM, in his individual capacity )  
as former Sheriff of Shelby County, )  
Tennessee; FLOYD BONNER, JR. )  
in his official capacity as the Sheriff of )  
Shelby County, Tennessee; ROBERT )  
MOORE, in his individual capacity as )  
former Jail Director of Shelby County, )  
Tennessee; KIRK FIELD, in his )  
official capacity as the Jail Director of )  
Shelby County, Tennessee; CHARLENE )  
MCGHEE, in her individual capacity as )  
former Assistant Chief of Jail Security of )  
Shelby County, Tennessee; REGINALD )  
HUBBARD, in his official capacity as )  
Assistant Chief of Jail Security )  
Chief of Jail Security of Shelby County, )  
Tennessee; DEBRA HAMMONS, in her )  
individual capacity as former Assistant )  
Chief of Jail Programs; TIFFANY )  
WARD in her official capacity as the )  
Assistant Chief of Jail Programs of )  
Shelby County, Tennessee; )  
SHELBY COUNTY, TENNESSEE, a )  
Tennessee municipality; and TYLER )  
TECHNOLOGIES, INC., a foreign )  
corporation; GLOBAL TEL\*LINK )  
CORPORATION, a foreign corporation; )  
SOFTWARE AG CLOUD AMERICAS, )  
INC., a foreign corporation; and )  
SIERRA-CEDAR, INC., a foreign )  
corporation, )

Defendants. )

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**UNOPPOSED MOTION AND MEMORANDUM FOR EXTENSION OF TIME TO  
RESPOND TO FOURTH AMENDED COMPLAINT**

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Defendants Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, and Shelby County, Tennessee (“Shelby County Defendants” or “Defendants”) respectfully move the Court to enter an Order extending the time period for Defendants’ response to Plaintiffs’ Fourth Amended Class Action Complaint (“Fourth Amended Complaint”) to and including February 15, 2019.

In support of this relief, Defendants would respectfully show:

1. As set forth in the Certificate of Consultation below, Plaintiffs do not oppose this extension.
2. The Court is authorized to grant this relief under Rule 6(b) of the Federal Rules of Civil Procedure.
3. Plaintiffs filed their Fourth Amended Complaint on January 18, 2019. This amendment added new defendants, including new officials associated with Shelby County. Undersigned counsel needs additional time to resolve issues related to service of process and to coordinate the preparation of a responsive pleading for all Shelby County Defendants.

WHEREFORE, Shelby County Defendants request that the time in which to respond to the Amended Complaint be extended by a period of two weeks, to and including February 15, 2019.

Respectfully submitted,

/s/ Meghan M. Cox  
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*Counsel for Shelby County, Tennessee, Bill  
Oldham, Robert Moore, Charlene  
McGhee, and Debra Hammons*

**CERTIFICATE OF CONSULTATION**

The undersigned attorney for Shelby County Defendants hereby certifies that on February 1, 2019, Byron Brown consulted with Plaintiffs' counsel via email in accordance with this Court's Local Rule 7, and William Routt advised that Plaintiffs do not oppose the relief sought in this motion.

s/ Meghan M. Cox

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 1, 2019 the foregoing was served on all counsel of record via the Court's ECF Filing System.

s/Meghan M. Cox